

Jackie M. Ford, Esq. (SBN: 272641)
jford@structurelaw.com
Karen F. Rothschild, Esq. (SBN: 346949)
krothschild@structurelaw.com
STRUCTURE LAW GROUP, LLP
1754 Technology Drive, Suite 135
San Jose, California 95110
Telephone: (408) 441-7500
Facsimile: (408) 441-7501

Attorneys for Defendants
JACOB STINE and JUANITA TRAVER STINE

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IMPLICIT CONVERSIONS, INC., a
Delaware Corporation,

Plaintiff,

v.

JACOB STINE, an individual, JUANITA
TRAVER STINE, an individual, SAYED
MAHMOOD ALAWI, an individual, and
DOES 1-10, inclusive,

Defendants.

Case No. 3:24-cv-03744-JCS

**DECLARATION OF JUANITA TRAVER
STINE IN SUPPORT OF DEFENDANTS'
OPPOSITION TO PLAINTIFF'S MOTION
FOR TEMPORARY RESTRAINING
ORDER**

Date: August 7, 2024
Time: 2:00 p.m.
Judge: Hon. William H. Orrick

I, Juanita Traver Stine, declare as follows:

1. I make this declaration in support of Defendants Jacob Stine and Juanita Traver Stine's Opposition to Plaintiff's Motion for Temporary Restraining Order. The facts stated herein are true of my knowledge. If called upon, I could and would competently testify thereto.

2. My husband, Jacob Stine, is the co-founder of Implicit Conversions, Inc. ("Implicit" or the "Company"). I joined Implicit primarily as the Payroll Administrator, although my role was later expended to Human Resource Generalist.

3. On May 10, 2024, my husband suffered a medical emergency that required immediate attention, leading to his visit to the hospital as recommended by the crisis center. While he was not hospitalized, he was assessed and deemed to be in crisis, resulting in his

1 medical leave from work. As the head of Implicit's human resources, I was involved in
2 coordinating my husband's medical leave.

3 4. On May 13, 2024, I received a message from Robin Lavallee regarding my
4 husband's medical crisis that said: "Jake has always been writing stuff like that on Slack (self
5 harm, harm to others), in my private messages and I've learned to ignore it; I shouldn't have."

6 5. Mr. Lavallee and his wife, Isabelle Gagnon, told me they have a family member
7 with autism. On May 16, 2024, while my husband was on medical leave, I conversed with Ms.
8 Gagnon about my husband's leave and expressed my concern that Implicit needed to work with
9 him to provide reasonable medical accommodations. Ms. Gagnon wrote to me:

10 I'm the first one to know and take autism into consideration. I've been guiding
11 Robin a lot over the last year about how to interact with ... it's a sensitive topic. I
12 know that a big part about this conflict is directly related to Jake's autism. It hurts
13 me to know that it's difficult for Jake; I can see my [family members] in him ..."
(First ellipses in original.)

14 6. On June 24, 2024, I received a notice from Mr. Lavallee that my employment had
15 been terminated.

16
17 I declare under penalty of perjury under the laws of the United States that the foregoing
18 is true and correct. Executed this 16th day of July, 2024.

19
20 *Juanita Traver Stine*

21 _____
22 Juanita Traver Stine
23
24
25
26
27
28